

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE:)
) Case No. 07-24046
Aida D. Manalo;)
Raymundo M. Manalo, Jr.;) CH 13
) Judge Janet S. Baer
) Hearing: May 2, 2013 at 9:30am
DEBTOR(S).)

NOTICE OF MOTION

TO: Aida D. Manalo, 1586 Marshall Dr., Des Plaines, IL 60018
Raymundo M. Manalo, Jr.; 1586 Marshall Dr., Des Plaines, IL 60018
David M. Siegel, 790 Chaddick Drive, Wheeling, IL 60090
Tom Vaughn, 55 E. Monroe Street, Suite 2850, Chicago, IL 60603

PLEASE TAKE NOTICE that on May 2, 2013 at 9:30 a.m., or as soon thereafter as counsel may be heard, I shall appear before the Honorable Janet S. Baer or any judge sitting in her stead, in the courtroom usually occupied by her in Room 615 at 219 South Dearborn Street, Chicago, IL 60604, and move to present the attached Motion.

/s/ Nisha Parikh
Attorney for Creditor

PROOF OF SERVICE BY MAIL

THE UNDERSIGNED, being first duly sworn on oath, deposes and says that she served a copy of this notice by mailing a copy to the above named parties at the above named addresses and depositing the same in the U.S. Mail at Naperville, Illinois 60563, with postage prepaid, on April 19, 2013.

/s/ Brittany Neubauer

FREEDMAN ANSELMO LINDBERG LLC
1807 W. Diehl Rd., Ste 333
Naperville, IL 60563
630-453-6960 866-402-8661 630-428-4620 (fax)
Clay A. Mosberg- 1972316, Karl V. Meyer- 6220397, Bryan D. Hughes- 6300070,
Ann W. Lopez- 6190037, Jonathan Nusgart- 6211908, Nisha B. Parikh- 6298613
XB1304014

**THIS COMMUNICATION IS AN ATTEMPT TO COLLECT A DEBT, AND ANY
INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.**

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MOTION TO EXTEND TIME TO FILE A RESPONSE TO FINAL CURE

Now comes HSBC Mortgage Services, secured creditor herein, by and through its attorneys, FREEDMAN ANSELMO, LINDBERG and moves for the entry of the attached order extending the time to file a response to final cure, and in support thereof respectfully states as follows:

1. Debtors filed for Chapter 13 Bankruptcy on 12/21/2007.
2. Trustee filed notice of final cure on 3/26/2013. (attached to the motion)
3. Attorney for movant needs more time to research the debtors contractual and post-petition mortgage payments.

WHEREFORE, movant prays for the entry of the attached Order extending the time to file a response to file cure to May 17, 2013.

HSBC Mortgage Services

/s/ Nisha B. Parikh

Attorney for Creditor

FREEDMAN ANSELMO LINDBERG LLC

1807 W. Diehl Rd., Ste 333

Naperville, IL 60563

630-453-6960 866-402-8661

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Attorney No. Cook 26122, DuPage 42005, Kane 031-26104,

Peoria 1794, Winnebago 3802, IL 03126232

Clay A. Mosberg- 1972316, Karl V. Meyer- 6220397, Bryan D. Hughes- 6300070, Ann W. Lopez- 6190037, Jonathan Nusgart- 6211908,

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